



Hughes Hubbard & Reed LLP
One Battery Park Plaza
New York, New York 10004-1482
Telephone: +1 (212) 837-6000
Fax: +1 (212) 422-4726
hugheshubbard.com

December 3, 2021

BY EMAIL

Alan E. Schoenfeld
Wilmer Cutler Pickering Hale and Dorr LLP
7 World Trade Center
250 Greenwich Street
New York, NY 10007
alan.schoenfeld@wilmerhale.com

Re: In re Customs and Tax Administration of the Kingdom of Denmark
(Skatteforvaltningen) Tax Refund Scheme Litigation, 18-md-2865 (LAK)

Dear Alan:

On behalf of our client, Skatteforvaltningen (“SKAT”), we are sending you by Kiteworks the following productions containing documents from the following producing parties:

Producing Party	Bates Range
Skatteforvaltningen	SKAT_MDL_001_00632446 to SKAT_MDL_001_00667881 and overlay
Capital One Bank	CAPITALONE_00000001 to CAPITALONE_00000199
Elysium Global (Dubai) Limited and Elysium Properties Limited	ELYSIUM-10444539 to ELYSIUM-10445435 and overlay
Fidelity Workplace Services, LLC	FIDELITYWORKPLACE_00000001 to FIDELITYWORKPLACE_00000205
Special Administrators of Solo Capital Partners LLP and Administrators of the Associated Entities ¹	SCPADMINISTRATORS_00000001 to SCPADMINISTRATORS_00062285

1. Documents received from the Special Administrators of Solo Capital Partners LLP and Administrators of Solo Group (Holdings) Limited, Solo Group Services Limited, Old Park Lane Capital Limited, Telesto Markets LLP,

We are also sending you by Kiteworks a production of rough translations created by ULG for purposes of the proceedings in England. These translations are provided for convenience only and SKAT makes no representations or agreements as to the accuracy, reliability, or admissibility of any translations provided. The rough translations are Bates-stamped with the first Bates number of the translated document, followed by _T.

The above-described productions and rough translations are all designated “Confidential” or “Highly Confidential” pursuant to the Protective Order entered in the above-captioned matter on November 6, 2020.²

We are also sending you by Kiteworks a declaration from a representative of Deloitte Professional Services (Dubai) Limited regarding the collection and production of documents that SKAT has obtained in its action pending before the Dubai International Financial Centre Courts against Elysium Global (Dubai) Limited and Elysium Properties Limited (the “Elysium documents,” as referenced in Judge Kaplan’s Order Granting SKAT’s Consent Motion in the multi-district litigation (ECF No. 286)).

This production completes SKAT’s productions in the above-captioned matter. SKAT will continue to produce documents received from third-parties pursuant to subpoena or Hague request.

The passwords for the productions will be sent by separate email. If you have any questions, please contact me at 212-837-6710.

Sincerely,

Valerie F Cahan

Valerie Cahan

cc: All counsel of record, by email

and West Point Derivatives Limited (the “Associated Entities”) pursuant to the July 8, 2021 Order issued in *Skatteforvaltningen (The Danish Customs and Tax Administration) v Avani Management LLC & Others* [2021] EWHC QF 2021-007459 (QB) ¶ 8(h).

2. This production contains documents obtained in SKAT’s action pending before the Dubai International Financial Centre Courts against Elysium Global (Dubai) Limited and Elysium Properties Limited. We are also sending an overlay of documents previously withheld from SKAT pending review. The materials Bates-stamped ELYSIUM-10444539 to ELYSIUM-10445435, as well as the overlay documents, are designated Confidential pursuant to the Revised Amended Stipulated Protective Order entered in the above-captioned matter on November 6, 2020. Because these files are being produced in native format, they are not individually stamped with their “Confidential” designation.